REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing

Amendment and the following remarks.

Claims 1-20 were pending in this application. Claims 2 and 21-34 have been cancelled

and claims 1, 11 and 20 have been amended hereby. Accordingly, claims 1 and 3-20 will be

pending herein upon entry of this Amendment. Support for the Amendment to each of the

independent claims can be found, for example, in cancelled claim 2, the paragraph bridging

pages 2 and 3, and the paragraph bridging pages 15 and 16 of the present application. For the

reasons stated below, Applicants respectfully submit that all claims pending in this application

are in condition for allowance.

In the Office Action, claims 1-20 were rejected under 35 U.S.C. §103(a) as being

unpatentable over Golden et al., (U.S. Patent 5,774,872) in view of Examiner's Official Notice.

To the extent this ground of rejection might still be applied to claims presently pending in this

application, it is respectfully traversed.

The present invention is directed to methods of coordinating the verification of customer

bills that are generated for thousands of customers at a time, typically on a batch basis. In the

particular application discussed in the description of the embodiments, the customer bills are

bills associated with telecommunications services such as telephone service. These bills, as

required by law, include taxes that must be paid by the customers. Because of the sometimes

complex nature of the tax structures and calculations, it is not uncommon for errors to appear on

customer bills. Such errors can have significant ramifications including adverse legal action

taken against the telecommunications service provider. Significantly, strict control over the

generation of bills may sometimes be compromised since this function is often outsourced to an

entity outside of the umbrella of the telecommunications service provider. Understandably, it is

thus extremely important to monitor the bill generation processes by an outside vendor.

The independent claims of the present application have been amended to more clearly

recite the relationship between and responsibilities of the telecommunications service provider

and an entity other than the telecommunications service provider, namely an entity that provides

outsourced billing services.

Specifically, amended claim 1 now recites a method of verifying taxes on a batch of

customer bills that are initially generated and are ultimately to be sent out by an entity other than

the telecommunications service provider. That is, in accordance with amended claim 1, the

telecommunications service provider, i.e., the entity with whom a customer completes a

transaction, does not initially generate any bills and further does not ultimately send out any

bills. Rather, as further recited in amended claim 1, the telecommunications service provider

independently calculates "calculated tax results" and compares those calculated tax results with

tax charges that are included on the bills initially generated by the outsourced entity. These

initially generated bills are referred to in the application and claims as "hold bills." Thus, in

accordance with amended claim 1, an outsourced entity first generates a batch of customer bills.

The telecommunication service provider, with whom the customer completes transactions (e.g.,

toll call), then downloads billing data associated with customer accounts on which the hold bills

were originally based. This information is then populated into a database, precalculation

functions are performed on at least a portion of that data, and some of the data is displayed for

users. Independent calculations of taxes are then performed and the results of these calculations,

namely "calculated tax results" are compared to the tax charges that are on the hold bills. If the

"calculated tax results" match the hold bills tax charges, the telecommunications service provider

then authorizes the release of the batch of hold bills, the printing of the hold bills as customer

bills and the sending of the customer bills to the customers. Amended independent claims 11

and 20 recite similar subject matter.

Golden et al. is directed to an automated tax calculation and collection system. (*See*

column 1, lines 8-9.) Golden et al. is concerned with not having to rely on the integrity of

merchants to comply with appropriate tax collection. (*See* column 2, lines 13-16.) In accordance

with the description in Golden et al., a central computer is programmed to analyze data collected

from a plurality of merchants and provide, either on a periodic basis or upon request, various

types of reports and summaries. For example, the central computer may generate for each

merchant a periodic report reflecting the total value of transactions performed by the merchant

and the total value of the transaction tax generated by the transactions during that period. (*See*

column 4, lines 62-column 5, line 3.)

Golden et al. further describes that the taxing authority can then use this information to

directly assess the tax due to each <u>merchant,</u> or can use it to verify the amounts actually sent by

the merchant. (*See* column 5, lines 5-8.)

It is quite clear from Golden et al. that it is the merchant itself, i.e., the entity that

provides services directly to customers, that is the entity that both generates and sends the bills to

its customers. The central computer in Golden et al. is used merely to verify that the merchant is complying with tax obligations. The central computer never initially generates a bill nor does the central computer of Golden et al., ultimately send any bills.

In contrast, each of the amended independent claims of the present application specifically requires that the outsourced entity initially generate and then ultimately send customer bills upon receiving authorization to do so. Golden et al., neither discloses nor suggests this particular methodology of the presently claimed invention. Accordingly, applicants respectfully request that the §103 rejection of the claims based on Golden et al. be reconsidered and withdrawn.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

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Date: January 21, 2004

Respectfully submitted,

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Attachments:

LDE/dkp

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